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April 30, 2004

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Certification of Exemption from the "Drop Off" Requirement;
CC Docket No. 94-129

Dear Ms. Dortch:

TDS Telecommunications Corp. ("TDS Telecom"), by its undersigned counsel, hereby certifies that it qualifies for an exemption from the "drop off" requirement set forth in 47 C.F.R. Section 64.1120. This certification is supported by the enclosed affidavit of Phillip Berry, Product Manager of TDS Long Distance and a longtime employee of TDS Telecom's parent company, Telephone and Data Systems, Inc.

Please address any questions regarding this certification to the undersigned. Thank you for your time and consideration.

Sincerely,



Gerard J. Waldron
Matthew S. DelNero

Enclosure

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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|---|---|----------------------|
| In the Matter of |) | |
| |) | |
| Implementation of the Subscriber Carrier |) | |
| Selection Changes Provisions of the |) | CC Docket No. 94-129 |
| Telecommunications Act of 1996 |) | |
| |) | |
| Policies and Rules Concerning |) | |
| Unauthorized Changes of Customers' |) | |
| Long Distance Carriers |) | |
| |) | |
| TDS Telecommunications, Inc. |) | |
| Certification of Inability to Comply with the |) | |
| Third-Party Verification "Drop Off" Rule |) | |

AFFIDAVIT OF PHILLIP BERRY

1. My name is Phillip Berry. Since September 2000, I have been the Product Manager of TDS Long Distance Corporation (TDS Long Distance). I joined the parent company of TDS Long Distance, TDS Telecommunications Corporation (TDS Telecom), in February 2000. Prior to that, I held various positions at U.S. Cellular Corporation (US Cellular) starting in August 1991. Both TDS Telecom and US Cellular are subsidiaries of Telephone and Data Systems, Inc.

2. As the Product Manager for TDS Long Distance, I am responsible for the implementation of the company's pricing, promotion, distribution, and marketing strategies. In that capacity, I oversee vendor relationships and contracts, including those related to third party verification of carrier change requests.

3. This affidavit is submitted pursuant to the Commission's Third Order on Reconsideration and Second Further Notice of Proposed Rulemaking (rel. March 17, 2003) concerning rules intended to prevent the unauthorized switching of a customer's long distance

carrier. There, the Commission established a mechanism for exemption from the rule, found at 47 C.F.R. § 64.1120(c)(3)(ii), which requires carriers to “drop off” a third party verification call once a three-way conference call has been initiated between the carrier, caller, and verifier. Specifically, the Commission stated its intention to “exempt from the rule those carriers that certify to the Commission that their sales agents are unable to drop off the sales call after initiating a third party verification.” 18 FCC Rcd. 5099, 5113.

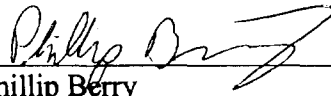
4. I hereby certify, on behalf of TDS Telecom’s local exchange operating companies (listed on the attached Exhibit A) and TDS Long Distance Corp., that TDS Telecom’s marketing representatives are unable to comply with the “drop off” rule because of administrative and technical limitations that make dropping off a third party verification call infeasible. TDS Telecom is planning to implement, in the vast majority of its operations, the technological upgrades that would bring it into compliance with the drop off rule. However, until such a mechanism is implemented, it is not possible as an administrative or technical matter for TDS Telecom to comply with the drop off rule.

5. Accordingly, TDS Telecom requests an exemption from the drop off rule for two years from the date this Affidavit is received by the Commission. Note that well before the end of that two year period, TDS Telecom expects to have implemented the technology necessary to comply with the drop off rule for the bulk of its third party verification calls.

6. Although TDS Telecom’s marketing agents are currently unable to drop off third-party verification calls, these agents will continue to comply with all other applicable Commission rules and/or policies concerning the handling of customer change requests. For example, TDS Telecom’s marketing agents do not and will not provide any commentary or assistance during the third party verification process, and any attempt to do so will result in

termination of the third party verification procedure and invalidation of the customer's carrier change request.

I, Phillip Berry, declare and affirm under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.


Phillip Berry

Executed this 30th day of April, 2004.

EXHIBIT A**TDS TELECOM WIRELINE LOCAL EXCHANGE COMPANIES**

| Company Name | Filer 499 ID (TRS#) |
|--|---------------------|
| Amelia Telephone Corp. | 806607 |
| Arcadia Telephone Company | 806544 |
| Arizona Telephone Company | 805434 |
| Arvig Telephone Company | 806766 |
| Asotin Telephone Company | 805437 |
| Badger Telephone Company | 805563 |
| Barnardsville Telephone Co, Inc. | 806562 |
| Black Earth Telephone Company | 805560 |
| Blue Ridge Telephone Co. | 806634 |
| Bonduel Telephone Company | 805566 |
| Bridge Water Telephone Company | 804465 |
| Burlington, Brighton & Wheatland Telephone Co. | 805569 |
| Butler Telephone Company, Inc. | 806589 |
| Calhoun City Telephone Company Inc. | 806637 |
| Camden Telephone Company, Inc. | 802068 |
| Camden Telephone & Telegraph Co. | 806823 |
| Central State Telephone Company | 805572 |
| Chatham Telephone Company | 806523 |
| Cleveland County Telephone Company | 805440 |
| Cobbosseecontee Telephone Company | 801201 |
| Communications Corporation of Indiana | 806559 |
| Communications Corporation of Michigan | 806526 |
| Communications Corporation of Southern Indiana | 806556 |
| Concord Telephone Exchange, Inc | 806604 |
| Continental Telephone Company | 806541 |
| Decatur Telephone Company | 805443 |
| Delta County Tele-Comm, Inc. | 805446 |
| Deposit Telephone Company | 801840 |
| Dickeyville Telephone Corporation | 807810 |
| EastCoast Telecom, Inc. | 805575 |
| Edwards Telephone Company | 806781 |
| Farmers Telephone Co. | 807813 |
| Grantland Telecom, Inc. | 805578 |
| Hampden Telephone Company | 803232 |
| Happy Valley Telephone Company | 805449 |
| Hartland & St. Albans Telephone Company | 806802 |
| Hollis Telephone Company, Inc. | 809570 |
| Home Telephone Company of Pittsboro, Inc. | 806550 |
| Home Telephone Company, Inc. – Waldron | 806553 |
| Home Telephone Company | 805452 |

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| Hornitos Telephone Company | 805455 |
| Humphrey's County Telephone Co. | 806565 |
| Island Telephone Company | 806820 |
| Kearsage Telephone Company | 806796 |
| Leslie County Telephone Co., Inc. | 806619 |
| Lewis River Telephone Company | 807207 |
| Lewisport Telephone Co. | 806625 |
| Little Miami Communications Corporation | 806547 |
| Ludlow Telephone Company | 806805 |
| Mahanoy & Mahantango Telephone Company | 806808 |
| McClellanville Telephone Co., Inc. | 806586 |
| McDaniel Telephone Company | 804768 |
| Merchants & Farmers Telephone Company | 809001 |
| Merrimack County Telephone Company | 808275 |
| Mid-America Telephone Company | 805461 |
| Mid-Plains, Inc. | 806862 |
| Mid-State Telephone Company | 805585 |
| Midway Telephone Company | 805581 |
| Mt. Vernon Telephone Company, Inc. | 805584 |
| Myrtle Telephone Company, Inc. | 805866 |
| Nelson-Ball Ground Telephone | 802134 |
| New Castle Telephone Co. | 806628 |
| New London Telephone Company | 805464 |
| Northfield Telephone Company | 806793 |
| Norway Telephone Company Inc. | 806574 |
| Oakman Telephone Company, Inc. | 806580 |
| Oakwood Telephone Company | 806538 |
| Oklahoma Communication System, Inc. | 805467 |
| Orchard Farm Telephone Company | 805470 |
| Oriskany Falls Telephone Company | 806814 |
| Peoples Telephone Company, Inc. | 806631 |
| Perkinsville Telephone Company | 806790 |
| Port Byron Telephone Company | 806817 |
| Potlatch Telephone Company, Inc. | 805473 |
| Quincy Telephone Company | 806583 |
| Riverside Telecom, Inc. | 805587 |
| Salem Telephone Co. | 806622 |
| Saluda Mountain Telephone Co. | 806616 |
| Scandinavia Telephone Company | 805590 |
| Service Telephone Co. | 806601 |
| Shiawassee Telephone Company | 806532 |
| Somerset Telephone Company | 806799 |
| Southeast Mississippi Telephone Co., Inc. | 806577 |
| Southeast Telephone Company of Wisconsin, Inc | 808374 |
| Southwestern Telephone Company | 805377 |

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| St. Stephen Telephone Company | 806592 |
| Stockbridge & Sherwood Telephone Company, Inc. | 805593 |
| Stoutland Telephone Company | 805476 |
| Strasburg Telephone Company | 805479 |
| Sugar Valley Telephone Company | 806775 |
| S & W Telephone Company, Inc. | 801558 |
| Tellico Telephone Co., Inc. | 806613 |
| Tennessee Telephone Company | 806610 |
| Tenney Telephone Company, Inc. | 805596 |
| The Island Telephone Company | 806529 |
| Tipton Telephone Company | 804819 |
| Township Telephone Company | 808425 |
| Tri-County Telephone Company | 801264 |
| Troy Telephone Company | 805482 |
| Utelco, Inc. | 801945 |
| The Vanlue Telephone Company | 808419 |
| Vernon Telephone Company | 809218 |
| Virginia Telephone Co. | 806568 |
| Warren Telephone Company | 806787 |
| Waunakee Telephone Company | 805602 |
| West Penobscot Telephone & Telegraph Company | 806784 |
| Williston Telephone Co. | 806598 |
| Wilton Telephone Co., Inc. | 809034 |
| Winsted Telephone Company | 806409 |
| Winterhaven Telephone Company | 805485 |
| Wolverine Telephone Company | 806535 |
| Wyandotte Telephone Company | 805488 |